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November 14, 2005

Mr. Arthur Neal
Director of Program Administration
NATIONAL ORGANIC PROGRAM
United States Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Email

Reference Document Number TMD – 04-01

Dear Mr. Neal

We are producers and handlers of certified organic livestock and consumer-ready products – and would prefer to use *peracetic acid in and/or on products labeled Organic*.

Therefore we are requesting the *National Organic Program (NOP)* to permit the use of:

Peracetic Acid/Peroxyacetic Acid – 205.605(b)

“For use in wash and/or rinse water according to FDA Limitations. For use as a sanitizer on food contact surfaces on agricultural products labeled - Organic”.

And:

Peracetic Acid/Peroxyacetic Acid – 205.603(a).

For the use in/or on facilities and processing equipment sanitation (barns, milking parlors, processing areas).

Clearly this was the intent of the *National Organic Standards Board (NOSB)* unanimous vote and recommendations to place “*Peracetic Acid* on the *National List of Materials for Livestock and Handling*” as was done for *Organic Crops*.

We appreciate your reconsideration and action relative to our request and look forward to a change of status of *Peracetic Acid for the use of and/or on agricultural products labeled “Organic”* in the **Final Rule**.

Thank you.

Sincerely,

Jay Wilson
Senior VP and Chief Operating Officer

JW/cd